

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JEFFREY LAYDON, on behalf of himself and all others
similarly situated,

Plaintiff,

- against -

THE BANK OF TOKYO-MITSUBISHI UFJ, LTD., THE
SUMITOMO TRUST AND BANKING CO., LTD., THE
NORINCHUKIN BANK, MITSUBISHI UFJ TRUST AND
BANKING CORPORATION, SUMITOMO MITSUI
BANKING CORPORATION, J.P. MORGAN CHASE &
CO., J.P. MORGAN CHASE BANK, NATIONAL
ASSOCIATION, J.P. MORGAN SECURITIES PLC,
MIZUHO CORPORATE BANK, LTD., DEUTSCHE
BANK AG, THE SHOKO CHUKIN BANK, LTD.,
SHINKIN CENTRAL BANK, UBS AG, UBS
SECURITIES JAPAN CO. LTD., THE BANK OF
YOKOHAMA, LTD., SOCIÉTÉ GÉNÉRALE SA, THE
ROYAL BANK OF SCOTLAND GROUP PLC, THE
ROYAL BANK OF SCOTLAND PLC, RBS SECURITIES
JAPAN LIMITED, BARCLAYS BANK PLC, CITIBANK,
NA, CITIGROUP, INC., CITIBANK, JAPAN LTD.,
CITIGROUP GLOBAL MARKETS JAPAN, INC.,
COÖPERATIEVE CENTRALE RAIFFEISEN-
BOERENLEENBANK B.A., HSBC HOLDINGS PLC,
HSBC BANK PLC, LLOYDS BANKING GROUP PLC,
ICAP EUROPE LIMITED, R.P. MARTIN HOLDINGS
LIMITED, MARTIN BROKERS (UK) LTD., TULLETT
PREBON PLC, AND JOHN DOE NOS. 1-50,

Defendants.

Docket No. 12-cv-3419 (GBD) (HBP)

**PLAINTIFF'S NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT WITH DEFENDANTS HSBC HOLDINGS PLC AND HSBC
BANK PLC**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the
Declaration of Vincent Briganti and the exhibits attached thereto including the Settlement
Agreement, the Declaration of Geoffrey M. Horn and the exhibits attached thereto, and the record

herein, Plaintiff, by and through his undersigned counsel, will respectfully move this Court, before the Honorable George B. Daniels, United States District Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York on a date and time to be set by the Court, for an order granting Plaintiff's motion for preliminary approval of the Settlement Agreement between Plaintiffs and HSBC Holdings plc and HSBC Bank plc, and their subsidiaries and affiliates (collectively "HSBC") and the other relief set forth in the proposed superseding order annexed hereto.

Dated: June 17, 2016
White Plains, New York

**LOWEY DANNENBERG COHEN & HART,
P.C.**

/s/ Vincent Briganti

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